



Wyoming Association of Conservation Districts
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February 22, 2015

Via Facsimile: 303-312-6339

Shaun McGrath
Region VIII EPA Administration
1595 Wynkoop St.
Denver, CO 80202-1129

RE: Wyoming's Categorical Use Attainability Analysis for Contact Recreation use designations

Dear Administrator McGrath,

On behalf of Wyoming's 34 local Conservation Districts, we are writing to request your approval of the above reference Categorical Use Attainability Analysis (UAA) as submitted by the Wyoming Department of Environmental Quality (WDEQ).

The Districts, are authorized by Wyo. Stat. §§ 11-16-101 *et. seq.*, with the statutory responsibility to implement soil and water conservation projects and programs, including but not limited to, flood prevention, the conservation, development, utilization and disposal of water within the district. The districts have taken the leadership role in water quality assessment, planning and implementation in the state on waters within their jurisdiction, including those waters on the state's section 303(d) list of impaired and threatened waters. As such, they have intricate knowledge and expertise of local watershed conditions and work extensively with landowners and their local communities in implementing best management practices aimed toward enhancing and improving water quality. The districts invest considerable financial resources into water quality work. Several districts have been actively engaged in completing Use Attainability Analysis on waters throughout the state to ensure they are protected for the appropriated designated uses.

The Association and its member districts were specifically involved in assisting the WDEQ in ensuring that the Categorical Use Attainability Analysis for Contact Recreation uses was a scientifically defensible and accurate approach to addressing the accurate designation of primary and secondary contact recreation uses on Wyoming's waters. It is a priority of the Association's and the member districts, that those waters capable of supporting primary recreation uses are accurately designated to ensure that human health is protected. In addition, the Association believes the highest priority should be given to those waters where recreational use is attainable and efforts to assess and protect the water quality are paramount.

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To assist DEQ in validating the UAA GIS model, the districts assisted with field verification. Over 700 randomly selected sites were provided to the districts. The districts spent a tremendous amount of resources, validating those sites throughout the summer and fall of 2010. Some of the sites were located in remote wilderness and wildland areas requiring districts to hike and horseback into the areas to document the conditions. They did so without hesitation knowing the importance of ensuring that waters in this state are accurately designated and protected to ensure the highest protection for human health. Further, the districts and Association provided substantive comment throughout the public comment process, which was extensive and available to any interested party, including extensive consultation with the US Environmental Protection Agency both at the regional and national level.

The commitment of the local districts and their communities to the protection of water quality in Wyoming is evident by the extensive level of implementation activity related to water quality enhancement and improvement undertaken by conservation districts, specifically related to section 303(d), as detailed in the "Watersheds Progress Report" published periodically by the Association.¹ These reports also detail the significant financial investment that the districts, local communities, landowners/homeowners, and the state of Wyoming have put forth into water quality improvement efforts and the protection of their citizens who recreate in these waters. Please note, that in 2011 the combined investment into watersheds over a span encompassing two years, 2009-2011, exceeded \$21 million. A significant portion of this \$21 million is non-federal, private, local and state government investments.

As the local government primarily charged with natural resource conservation, the Association and the member districts, believe the WDEQ's Categorical Use Attainment Analysis is scientifically based and defensible.

We look forward to EPA's approval of this UAA so that water quality work in Wyoming can be focused in the state on those priority recreational use waters.

Respectfully,



Shaun Sims

President

Cc: Wyoming's Conservation Districts
Wyoming Department of Agriculture
Wyoming Department of Environmental Quality
Honorable Matt Mead, Governor, State of Wyoming

¹ Watersheds Progress Report, 2005; 2007; 2009; 2011; 2015 (in publication)